

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Terry Glen Tucker, Esquire
Attorney-at-Law
80 West Broad Street
Bridgeton, NJ 08302
(856) 453-7440

In Re:

Yahaira Morales

FILED
JEANNE A. NAUGHTON, CLERK
NOV 14 2019
U.S. BANKRUPTCY COURT
CAMDEN, N.J.
BY *[Signature]* DEPUTY

Case No.: 18-14796

Judge: JNP

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

- ☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**
☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed
by Mid First Bank, creditor,

A hearing has been scheduled for Nov. 26th, at 10 a.m.

OR

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____ m.

- ☐ Certification of Default filed by _____, creditor,

I am requesting a hearing be scheduled on this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**): Lost my job - Case P.A.A.C. helped me catch up by sending the mortgage a check in the amount of \$3370.00 I'm up to date

☐ Other (**explain your answer**): _____

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: x 11/12/19

x
Debtor's Signature

Date: _____

Debtor's Signature

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay* or *Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.

10/16/19

Att: Bankruptcy Dept.

Fax: 405-767-5924

Yahaira morales

856-982-0921

Loan # 0056934513

10711
4 pages including
Cover page

10711

STAPLES®

Your fax has been sent successfully!

Date: Wed Oct 16 13:12:01 EDT 2019

Phone Number: 4057675924

Images Scanned: 11

Fax Id: 47158601-1f48-48ec-ac32-7a9fa6966aa3

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Store No: 0312
2124 North 2nd Street
Millville, NJ 08332
856-293-0914

262626 00 026 90160

Receipt #: 90160 10/16/2019 13:12

Qty	Description	Amount
11	Fax Long Distance - 2332921 (405-767-5924)	25.19
	SubTotal	25.19
	Taxes	0.83
	Total	USD \$26.02

VISA #:*****2081 [S]

Swipe

Auth No.: 452314

The Cardholder agrees to pay the
Issuer of the charge card in
accordance with the agreement between
the Issuer and the Cardholder.

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Valid through 11/9/19.

Coupon code: 79525

Valid online at staples.com/services/printing or in Staples® U.S. stores. Excludes Daily Deals, Auto Restock orders, banner accessories and outsource printing. While supplies last. Limit one coupon per customer, nontransferable. Offer is subject to change or cancellation at any time. Minimum purchase requirement must be met with purchases to which no other coupon or instant savings offer applies. Tax and shipping not included in calculating the minimum purchase. Each item purchased can only be discounted by one coupon, applied by cashier in the order received. Coupon not valid if purchased or sold and must be surrendered. No cash/credit back. Not valid on prior purchases or purchases made with Staples® Procurement or Convenience Cards. Coupon value applied pre-tax.
Expires 11/9/19.



10% off shipping.

Valid through 11/9/19.

Coupon code: 15596

Valid in Staples® U.S. stores only. Excludes postage stamps. While supplies last. Limit one coupon per customer, nontransferable. Offer is subject to change or cancellation at any time. Each item purchased can only be discounted by one coupon, applied by cashier in the order received. Coupon not valid if purchased or sold and must be surrendered. No cash/credit back. Not valid on prior purchases or purchases made with Staples® Procurement or Convenience Cards. Coupon value applied pre-tax.
Expires 11/9/19.



Free shredding up to 2 lb.

Coupon code: 35987

Valid in Staples® U.S. stores only. While supplies last. Limit one coupon per customer, nontransferable. Offer is subject to change or cancellation at any time. Each item purchased can only be discounted by one coupon, applied by cashier in the order received. Coupon not valid if purchased or sold and must be surrendered. No cash/credit back. Not valid on prior purchases or purchases made with Staples® Procurement or Convenience Cards. Coupon value applied pre-tax. Expires 11/9/19.



KML LAW GROUP, P.C.

A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA

216 Haddon Avenue, Suite 406

Westmont, NJ 08108

(215) 627-1322

www.kmlawgroup.com

October 7, 2019

Yahaira Morales
801 8th North Street
Millville, NJ 08332

TERRY TUCKER
Terry Glen Tucker, P.C.
80 West Broad Street
Bridgeton, NJ 08302

RE: Yahaira Morales
Case No. 18-14796 JNP
Premises: 801 8th North Street Millville NJ 08332
Secured Creditor: MidFirst Bank

TO WHOM IT MAY CONCERN:

The Motion for Relief from Stay and supporting documents were served on you on **October 7, 2019**. Please be advised that the Motion for Relief from Stay is returnable before Judge **Poslusny, Jerrold N. Jr.** on **November 5, 2019 at 10:00 A.M.**

Please be guided accordingly.

Very truly yours,

KML LAW GROUP, P.C.
A Professional Corporation incorporated in Pennsylvania

/s/ Denise Carlon, Esq.

Brian C. Nicholas, Esquire

Denise Carlon, Esquire

KML Law Group, P.C.

216 Haddon Avenue, Ste. 406

Westmont, NJ 08108

(215) 627-1322

DCarlon@KMLlawgroup.com

Attorney for Movant/Applicant

@11:14am 11/5/19
Ln

Reschedule for 26th



IN THE MATTER OF:

Yahaira Morales

DEBTOR(S),

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEW
JERSEY**

CHAPTER 13
CASE NO. 18-14796 JNP

**STATEMENT AS TO WHY NO BRIEF IS
NECESSARY IN ACCORDANCE WITH
"LOCAL RULES OF BANKRUPTCY
PRACTICE" RULE 3(C)**

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the debtor(s) have failed to maintain their monthly mortgage payments to the Secured Creditor.

As the facts the secured creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

DATED: October 7, 2019

/s/ Denise Carlon, Esq.
Brian C. Nicholas, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
DCarlon@KMLlawgroup.com
Attorney for MidFirst Bank



UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Denise Carlon
KML LAW GROUP, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
MidFirst Bank

In Re:
Morales, Yahaira

Case No: 18-14796 JNP

Chapter: 13

Hearing Date: 11/5/19

Judge: Jerrold N. Poslusny Jr.

ORDER VACATING STAY

The relief set forth on the following page is hereby ordered **ORDERED**.

KML LAW GROUP, P.C.
A Professional Corporation incorporated in Pennsylvania
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
Attorneys for MidFirst Bank

4C

IN THE MATTER OF:

Yahaira Morales

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-14796 JNP

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

TO:

Yahaira Morales
801 8th North Street
Millville, NJ 08332

TERRY TUCKER
Terry Glen Tucker, P.C.
80 West Broad Street
Bridgeton, NJ 08302

Isabel C. Balboa Esq.
Chapter 13 Standing Trustee
Cherry Tree Corporate Center - 535 Route 38 - Suite
580
Cherry Hill, NJ 08002

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **MidFirst Bank**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **401 Market Street, P.O. Box 2067; Camden, NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as 801 8th North Street, Millville NJ 08332. The hearing on this matter is scheduled for **November 5, 2019 at 10:00 A.M.**

Dated: October 7, 2019

/s/Denise Carlon, Esq.
Brian C. Nicholas, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322
DCarlon@KMLlawgroup.com
Attorney for MidFirst Bank

20711

10/15/19

Yohanna Morales
801 North 8th St.
Millville NJ

①

Re: Order Vacating stay (payments)

to whom it may concern,

~~Yohanna~~ I Yohanna Morales DOB 8/27/83
last 4 digits of social # 6041 purchase
my home back in 2016. 801 North 8th St.
Millville, NJ 08332. I was employed
by Millville Savings & Loan.

On March 10, 2019 I was let go
from my job. Which it put my
two children and I in a situation
we never been before. my children's
names are Jose L Acevedo JR
DOB 2/20/05 and Yohanna M Acevedo
DOB 4/20/08 and my two small
dogs. The struggles were real. I don't
receive child support only \$50 a month.
Unemployment got denied twice and
welfare didn't help. All the doors
were closing on me.

I had called the electric company,
gas, oil, car and mortgage company
to inform my situation. Unemployment
took for ever with the money. The
mortgage company advise me as long
as I made payments it was fine.
But then the payments stop B/C
I couldn't with everything myself.

70711

②

with the little bit I was receiving kids school clothes, shoes, food, car & bills all on me was too much. I been the month of September and the month of October behind on bill I have no income. my friends been buying me food for the house and helping in what they can. I been so hurt and destroyed since I lost my job. I been working since I was 16 yrs old and on my own. no one had helped me. I build this Empire for my kids on my own to have it taken away.

I went to a local agency Casa Proa in Vineland and they said they will help my family. I got approved \$3,870 to be paid to my mortgage company but it takes 30-45 business days.

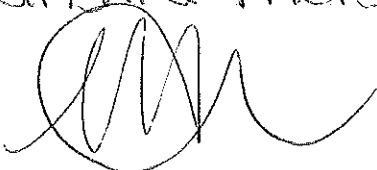
Please allowed this days for us to receive this payment. after this payment I want behind.

3
I finally got hired full time @
a Bank and as part time @
the dollar store.

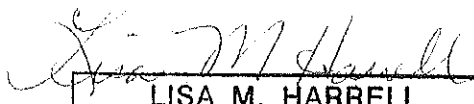
I'm trying my best to build
these family of mine once
again. please review my case
and take this payment that is
on their way and allow my
kids and I to stay with our
home.

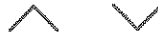
I be back on track moving
forward I been bless with a
two jobs and I will be
able to maintain my kids
home again.

Please Review and allow us
to stay in our home.

Sincerely
Yahaira Morales


Signed before me on
October 15, 2019


LISA M. HARRELL
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 6, 2022



Begin Your Career at Dollar Tree

October 11, 2019 at 9:45 AM

Dear Yahaira Morales:

It is our pleasure to inform you that you are a candidate for the position of PT CASHIER.

As you embark on a career with the leader in value retailing, you will need to complete certain documents.

J'

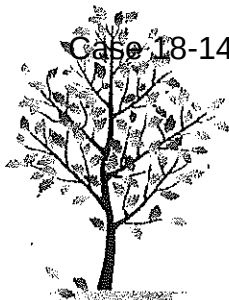
Click the Onboarding link below to access a secure and confidential website to complete necessary steps of the onboarding process.

You may need the following to complete this step of the process:

- Social Security Number
- Bank account information (if you want to sign-up for direct deposit)

We are required by legislation to verify that all newly hired individuals be authorized to





BRIDGETON ONIZED FEDERAL CREDIT UNION

339 Main Street • Cedarville, NJ 08311 (856) 692-4000 • Toll Free 888-896-4007

Yahaira Morales
801 North 8th St
Millville NJ 08332

September 26, 2019

Re: Offer of Employment

Dear Yahaira,

Please accept this letter as our offer of employment with Bridgeton Onized Federal Credit Union.

Start Date: 10/21/2019

Starting Salary: \$16.00 per hr

Position: Owner Service Representative Level 1

Expected Hours Per Week: 38+

Paid Time Off: As Per Policy


Trial Period: 90 Days

In addition, the credit union offers medical, dental and vision coverage for the employee which is partially paid by the credit union. Coverage for children or family is available at the employee's expense. There is a "buy-up" package that is available and the employee is responsible for the additional cost of this coverage. The waiting period for insurance coverage is 90 days.

Work hours initially are 8:20 through closing which is usually about 5:20 Monday through Thursday. On Tuesday, the day begins at 8:00 am with the Weekly Connection, a mandatory enterprise-wide meeting which lasts until approximately 9:10 am. Friday hours are extended to the ownership until 7:00 pm. Saturday hours begin at 8:20 and end at approximately 12:20 pm. Hours are subject to change at the discretion of management or as market demands.

Looking forward to having you on board.

Sincerely,


Joanne Casper September 26, 2019
Operations Manager

Yahaira Morales September 26, 2019
Owner Service Representative

Trust Your Bank...For Generations

110311

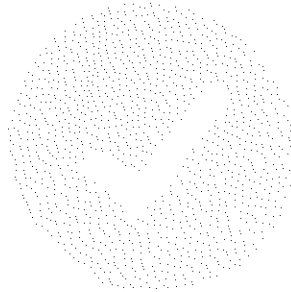
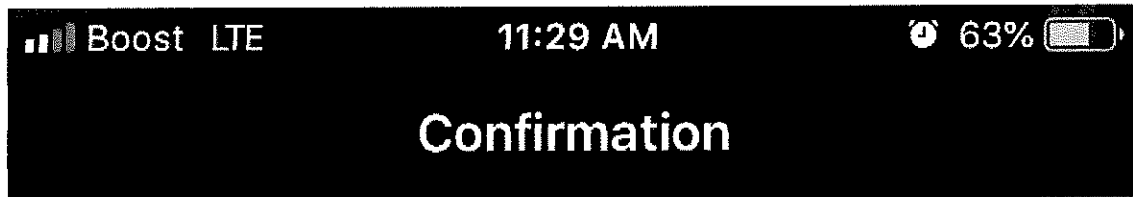
Fwd: Payment

From: Y Morales (yahairamorales2020@gmail.com)
To: mgoldsboro82@yahoo.com
Date: Tuesday, November 5, 2019, 08:18 AM EST

Sent from my iPhone

Begin forwarded message:

From: Y Morales <yahairamorales2020@gmail.com>
Date: November 5, 2019 at 8:13:09 AM EST
To: mgoldsboro82@yahoo.com
Subject: Payment



To	Midland Mortgage *4513
From	Simply Checking ****4442
Amount	\$823.00
Deliver by	Oct 22, 2019
Confirmation #	DMDVR_Q IDEC

CONTRIBUTION #

FINANCIAL SERVICES

Status

Scheduled

A payment may be canceled until it has been submitted to the biller.

Make Another Payment

View Scheduled Payments



Account



Payment



Bill



Payment Method



Help

1

Sent from my iPhone



HAROLD GONZALEZ BOARD PRESIDENT
JOSE A. MELENDEZ, EXECUTIVE DIRECTOR

September 23, 2019

Midland Mortgage
PO Box 26648
Oklahoma City, OK 73126-0648

Yahaira Morales
801 8th Street
Millville, NJ 08332

Re: Commitment Agreement

To Whom It May Concern:

This letter confirms the approval and commitment of the following consumers that apply for Mortgage assistance through SSH Program. Our payment will be mail out within 30-45 business days from date above.

<u>Consumer's Name</u>	<u>Loan Account:</u>	<u>Amount:</u>
Yahaira Morales	0056934513	\$ 3,370.00

Any questions or concerns, please feel free to contact our agency at (856) 692-2331 x108.

Sincerely,

Maria Maldonado
Coordinator of Rental/Utility Program
Casa P.R.A.C., Inc.
800 E. Chestnut Ave.
Vineland, NJ 08360